



1 immediately.

2 Q. Do you know what the end result was?

3 A. I do not.

4 Q. So you don't know if he died or whether or not  
5 he's --

6 A. I do not.

7 Q. -- still alive today?

8 A. I do not.

9 Q. All right. Did you ever have the occasion to  
10 deal with an inmate or detainee at the Cheatham County  
11 Jail who, in fact, did die?

12 A. No.

13 Q. Did you ever have an occasion to deal with an  
14 inmate -- excluding Ms. Hulsey's situation -- at the  
15 Cheatham County Jail who had some type of infection or  
16 illness that required you to call the doctor?

17 A. Not that I'm aware of.

18 Q. Do you know what sepsis is?

19 A. Infection of the blood.

20 Q. Do you know what MRSA is, M-R-S-A?

21 A. It's a skin infection.

22 Q. Did you ever have to deal with inmates or  
23 detainees that either has sepsis or MRSA?

24 A. No.

25 Q. Generally speaking, when an inmate or detainee

1 gets arrested and brought into the jail, what's the  
2 intake process?

3 A. We fill out a booking card. Take all their  
4 information, including address, emergency contacts. We  
5 will also fill out charges, that sort of thing, on the  
6 cards. And there's questions, some medical questions.  
7 We ask them if they are on any drugs or alcohol. Ask  
8 them if they are suicidal. I can't remember everything  
9 but, you know, just basic information that we'll need.

10 Q. Is that done on a physical piece of paper --

11 A. Yes, sir.

12 Q. -- or is it done electronically?

13 A. Yes, sir, on a piece of paper, and then  
14 transferred to a computer.

15 Q. Okay. I'm going to jump ahead one more time  
16 real quick.

17 Do you know if you personally were involved in  
18 the intake of Ms. Hulsey?

19 A. I don't believe so.

20 Q. Okay. Do you know what would have become of  
21 her booking card, the original hard copy?

22 A. It would have been archived.

23 Q. Okay. And where is the archives?

24 A. There's a little storage area right outside  
25 the jail that used to be a vehicle sally port, and

1     there's some filing cabinets.

2           Q.     All right. Do you know of any reason why that  
3     hard copy for Ms. Hulsey would no longer exist?

4           A.     Poor management of filing. It was a thing --  
5     it was usually a thing, you know, to get somebody to do  
6     it.

7           Q.     All right. Let me ask it this way: You don't  
8     know of any flood or fire that would have destroyed  
9     records. Correct?

10          A.     No, I don't.

11          Q.     In terms of being able to determine who  
12     actually conducted Ms. Hulsey's intake, how would one go  
13     about doing that?

14          A.     You should be able to look it up in the  
15     computer.

16          Q.     All right. We had received what I'm assuming  
17     is an electronic printout, and this was made Exhibit 2  
18     to Ms. Durham's deposition earlier. I don't know. Have  
19     you seen this printout before?

20          A.     I may have at some point.

21          Q.     Okay.

22          A.     But I haven't seen it since I've been not  
23     employed there.

24          Q.     Okay. Do you know, based on this document,  
25     how you would determine who it is that prepared the

1 intake?

2 A. It's been a while since I've looked at this  
3 so, bear with me.

4 I don't. I feel like I remember there was  
5 some kind of way to know who keyed it into the computer,  
6 but it wouldn't have just been on this form. It might  
7 have been on another page, because there's, you know, 20  
8 pages probably. But yeah, I don't see it on here.

9 Q. All right. In the hard copy that is prepared,  
10 is there also a place to note the intake officer's  
11 observations?

12 A. Yeah, there sure is: Whether they're calm,  
13 intoxicated, cooperative, that sort of thing. Yes, sir.

14 Q. So if somebody and intoxicated --

15 A. Sure.

16 Q. -- but was asked, "Have you had anything to  
17 drink?" and they say, "No," you're still able to put in  
18 information that says they appeared intoxicated?

19 A. Whatever we observed.

20 Q. Okay. Do you know if that information would  
21 be included in this printout form, or is there -- you  
22 said 20 pages. I don't know if that means there's  
23 another page for observations or what.

24 A. Well, it would have, you know, all the  
25 charges, you know, things that happened after that.

1 Twenty might be an exaggeration, but I'm not really  
2 sure.

3 Q. Okay. Is there anyplace on these two pages  
4 that we've been provided that would include the  
5 observations of the intake officer?

6 A. No, sir.

7 Q. All right. And so if that was -- in  
8 Ms. Hulsey's case, if there were observations made, we  
9 will need to look back at the original hard copy?

10 A. I would assume so.

11 Q. Okay.

12 A. Because I don't see it on this anyway.

13 Q. All right. Do you know what the jail protocol  
14 is for an inmate or detainee that gets arrested and is  
15 suffering from some type of drug withdrawal or detox?

16 A. One more time.

17 Q. What's the procedure that the jail will follow  
18 if an arrestee comes in and they are suffering from  
19 withdrawal from drugs or detoxing from drugs?

20 A. So if we were under the impression they were  
21 drunk or on drugs, we would call the nurse or a  
22 supervisor if we needed to -- see if we needed to do  
23 anything other than medical observation.

24 Q. All right. And after they're brought in and  
25 the intake is done, how long are they kept in the

1 someone is suspected to be withdrawing from drugs is not  
2 enough --

3 A. No.

4 Q. -- to warrant a call to medical. Is that  
5 correct?

6 A. That's correct.

7 Q. Okay. Did you know -- getting specific about  
8 Ms. Hulsey now. Did you know Ms. Hulsey prior to  
9 October 2016?

10 A. Not that I'm aware of, no, sir.

11 Q. So you didn't have any other interaction with  
12 her if she was a prior detainee or anything like that,  
13 to your recollection?

14 A. Not that I recall, no, sir.

15 Q. What is the first recollection you have of  
16 Ms. Hulsey in October of 2016?

17 A. Of the night I brought her up to booking, took  
18 her vitals, and put her on med watch.

19 Q. Do you know what night that was?

20 A. I believe it was the 11th, October 11th.

21 Q. Okay. What's your recollection of that night?

22 A. There was a call over the intercom, I believe,  
23 from one of the other inmates to the effect that there  
24 was some kind of medical emergency. I don't remember if  
25 I went back there by myself or if somebody went before

1 me. I just know when I got there she was laying on her  
2 bunk.

3 I believe I asked her if she was okay. She  
4 was talking to me. I think I helped her up from her  
5 bunk. She said she was in pain, felt weak. I escorted  
6 her to booking and sat her in a chair and took some  
7 vitals.

8 Q. All right. Do you recall what those vitals  
9 were?

10 A. They were within normal.

11 Q. Did you log those in any form? Do you know?

12 A. Not that I recall.

13 Q. Did you call the nurse?

14 A. Yes, sir.

15 Q. What did you tell the nurse?

16 A. That Ms. Hulsey was complaining of some pain.  
17 She wasn't feeling right.

18 Q. Anything else?

19 A. No, not really. Not that I remember. I just  
20 know that she just didn't feel good. My assumption was  
21 detox symptoms.

22 Q. Did you communicate that assumption?

23 A. Well, I mean, I think it was already something  
24 that the nurse was aware of.

25 Q. How do you know that?



1 A. Well, I don't honestly, but...

2 Q. So do you know whether or not you personally  
3 communicated to Nurse Plank that you suspected drug  
4 detox or withdrawal?

5 A. No, not during that phone call. No.

6 Q. Do you recall whether or not you communicated  
7 the vitals?

8 A. Yes, of course. That would be the whole  
9 reason for the phone call.

10 Q. Okay. And you would have given the actual  
11 values, the numerical values?

12 A. Yes.

13 Q. Okay. You don't recall what those were?

14 A. No, sir.

15 Q. And you didn't log them?

16 A. No, sir.

17 Q. Do you recall telling the nurse that  
18 Ms. Hulsey was panicking?

19 A. I believe so.

20 Q. Okay. And what do you mean by "panicking"?

21 A. She was just -- it just seemed like she didn't  
22 want to be in the back anymore, so it kind of seemed  
23 like a way for her to get out of there, was to ask for  
24 some medical attention.

25 Q. All right. Did you ever tell the nurse that

1 Ms. Hulsey had suffered a seizure?

2 A. I didn't see Ms. Hulsey have a seizure.

3 Q. Were you ever told by anybody that Ms. Hulsey  
4 had a seizure?

5 A. Not that I recall.

6 Q. If you had been told that she had suffered a  
7 seizure, what would your response have been?

8 A. I would have passed that information along.

9 Q. Do you recall what the nurse told you?

10 A. Since she had -- Ms. Hulsey was complaining of  
11 some pain, I think we gave her some ibuprofen or  
12 acetaminophen. I don't remember which one.

13 Q. Do you know what kind of pain she was  
14 describing?

15 A. Everywhere. She just said she hurt from her  
16 head to her toes, I'm sure.

17 Q. All right. Not specifically a headache?

18 A. No.

19 Q. Okay. I understand from the records that she  
20 was placed on a headache protocol in terms of medical --

21 A. Okay.

22 Q. -- response.

23 Do you recall telling Nurse Plank that she had  
24 a headache?

25 A. No, I don't recall that, but I may have.

1 Q. Okay. Would you have told Nurse Plank that  
2 she was hurting everywhere?

3 A. Maybe. I probably would have just said that  
4 she was complaining of pain.

5 Q. So you were directed by the nurse to  
6 administer Tylenol?

7 A. Or ibuprofen. I don't recall.

8 Q. And I take it at this point, that's an  
9 over-the-counter strength?

10 A. Yes, sir.

11 Q. Okay. Did you personally take her from the  
12 dorm to medical observation?

13 A. I don't know if I actually put her in cell,  
14 but I took her from the dorm to booking where we did the  
15 vitals.

16 Q. Okay. What, if any, other interaction did you  
17 have with Ms. Hulsey after that?

18 A. I don't remember having any further  
19 interaction.

20 Q. Were you ever informed or told about  
21 Ms. Hulsey's condition after that day?

22 A. I understood that she went to the hospital.

23 Q. Okay. And that was the next day, on the 12th?

24 A. I'm not sure if it was the next day. I don't  
25 know what days of the week it was. I might have been

1 Q. Is that a yes?

2 A. I'm sorry. Yes.

3 Q. Do you know why you called the nurse as  
4 opposed to the sergeant?

5 A. I guess he wasn't there. I'm not sure.

6 Q. Okay. Would it normally have been the  
7 sergeant that would have called then?

8 A. Whoever the supervisor was.

9 Q. Okay. So it's always the supervisor?

10 A. Not always. For example, Harley was an  
11 extension of me, really. She would have done some of  
12 that sort of thing from time to time.

13 Q. All right. So it's possible that the sergeant  
14 wasn't there, but it's also possible he was, but you  
15 were the one taking charge of that situation?

16 A. Yes, sir.

17 Q. Okay.

18 A. And I'm sure there's some way to find out. He  
19 might have been on vacation or something.

20 Q. We have logs. We can look at that.

21 A. Sure.

22 Q. What observations or information do you recall  
23 regarding Ms. Hulsey having bowel movements?

24 A. I just heard that she had soiled some uniforms  
25 on at least two occasions that I heard of. It wasn't

1 anything that happened on my shift that I recall for  
2 certain, but I do remember hearing about it.

3 Q. All right. Do you know if that was also  
4 information you conveyed to the nurse during that phone  
5 call?

6 A. It hadn't happened at that point in time.

7 Q. Do you recall making any observations of  
8 Ms. Hulsey while she was in med watch?

9 A. I'm sure I did, but I don't remember anything  
10 specific.

11 Q. Do you recall if Jeff Key was on shift with  
12 you at that time?

13 A. I believe so.

14 Q. Okay. Do you know why he noted that  
15 Ms. Hulsey was crying at about 9:50 p.m. on the 11th?

16 A. I'm not sure.

17 Q. What, if anything, did Ms. Hulsey tell you  
18 about her condition?

19 A. I don't really think she told me anything  
20 other than she was just in pain.

21 Q. Do you recall her having her tongue out --

22 A. No.

23 Q. -- and having difficulty talking with her  
24 tongue out?

25 A. No.

1           A.    I don't remember it that way.

2           Q.    Okay.  I assume not, but let me just ask the  
3 question, just to be sure.  Is the fact that a call  
4 comes in over the intercom, is that logged in any way?

5           A.    No, no.  It's just so we can respond.

6           Q.    If the event that you're responding to  
7 requires logging --

8           A.    Sure.

9           Q.    -- then you would log it?

10          A.    Sure.

11          Q.    Okay.  Do you know if you logged your  
12 interaction with Ms. Hulsey on the 11th?

13          A.    I don't think I wrote anything in the booking  
14 logbook, no.

15          Q.    Is there any other type of log that you would  
16 keep that would have a record of what was done for her?

17          A.    Other than the move, no.

18          Q.    Okay.  When a call goes in to the nurse, is  
19 that logged at all?

20          A.    I didn't.

21          Q.    Do you know if your policy and procedures  
22 requires that to be reported?

23          A.    I don't.  I know I did it for years without  
24 getting in trouble, so I figured it was okay.

25               MR. MOSELEY:  I believe those are my